

Exhibit 1

Geissler, Jonas (CRT)

From: Coromelas, Acrivi (CRT)
Sent: Wednesday, April 3, 2024 10:05 AM
To: Macias, Hannah; Heyer, Michelle L. (USAOHN); Goodrick, Jason (CPC); Anderson, Leigh; Johnson, Carlos; Thomas, Delante; Bielat, Martin
Cc: Yonekura, Stephanie; Charles See; karl.racine@hoganlovells.com; Wilhelm, Abby Jae; Giangrande Jacobs, Melissa; katie.obrien@hoganlovells.com; DeCaro, Sara (USAOHN); Evanovich, Michael (USAOHN) [Contractor]; Fitzgerald, Patricia M. (USAOHN); Geissler, Jonas (CRT); Mygatt, Timothy (CRT)
Subject: RE: CPC Document Requests

Good morning,

Thank you for providing some information about the types of information the City is reviewing for redaction purposes. Below, the City outlined that it anticipated review and redaction of one incident could take two weeks, in part because there was about 44.5 hours of body camera footage. The City claimed it needed to review footage because it might contain CJI.

The City does not need to redact body camera footage pursuant to CJIS. As we have repeatedly told the City, the Department of Justice, including the Federal Bureau of Investigation, does not consider body worn camera footage to implicate the CJIS Security Policy requirements. If there was any CJI information incidentally captured in the footage, the Department of Justice still considers the body worn camera footage to be outside the scope of the CJIS Security Policy requirements. Such incidentally captured CJI footage would also be outside the scope of the FBI CJIS Division's triennial audits. Accordingly, CJIS does not require that the City review body camera footage before producing it to the CPC. If the City believes that it has received advice to the contrary, please provide those communications.

Since body worn camera footage does not need to be redacted, we ask that the City provide an updated schedule for completing production of those materials subject of the City's Motion for Relief (ECF #507).

Thank you,

Acrivi

From: Macias, Hannah <HMacias@clevelandohio.gov>
Sent: Monday, March 25, 2024 4:39 PM
To: Heyer, Michelle L. (USAOHN) <MHeyer@usa.doj.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>; Anderson, Leigh <LAnderson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>
Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <SDeCaro@usa.doj.gov>; Evanovich, Michael (USAOHN) [Contractor] <MEvanovich@usa.doj.gov>; Fitzgerald, Patricia M. (USAOHN) <PFitzgerald@usa.doj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>
Subject: [EXTERNAL] RE: CPC Document Requests

Good afternoon all,

Below are the City's responses to the questions provided by DOJ:

1. Going forward, how will the City handle production of requested materials to CPC that reside with OPS and the CPRB?
As discussed in the CPC work group, the CPC and CPRB are working collaboratively together to determine a process for which any requested materials from OPS/CPRB will be provided to CPC in a timely manner. This process is outlined in an draft MOA (not yet finalized) to be agreed upon by both the CPC and CPRB with the POCs for CPC as the ED & Co-Chairs and for OPS/CPRB as the Administrator and Chair.
2. When does the City expect to begin a rolling production to CPC of the materials that were the subject of the City's Motion for Relief (ECF #507), and when will the City have in place a schedule for completing production of those materials? (Addition: please provide a rolling production calendar for all of the CPC's outstanding information requests)
The City is currently working through two processes to provide the requests documents to the CPC. First, the City is reviewing past public records requests that contain the same information requested by the CPC in an effort to produce full documents that were already reviewed and redacted. This list is utilized to cross-reference any requested materials from CPC so the City can identify the total number of documents that will need to be reviewed and redacted and not unnecessarily duplicate efforts. Second, the City is completing redactions for a sample comprehensive case file to provide to the CPC to help gain clarity for what records the CPC specifically wants as well as to determine the length of time to complete the whole record production process, including redactions.

This case file contains approximately 1,400 pages as well as associated WCS totaling 44 hours and 37 minutes that all needs to be reviewed for redactions. The City is estimating it will take 2 full weeks for Law's public record section to review and redact documents and CDP Mobile Support to review and redact the associated WCS. Note, this does not take into account the typical duties that need to be completed by these sections. As the City works to provide this sample case to the CPC, we are hopeful this will provide clarity to the Commission for what these full files entail and will help the Commission determine whether there is a need for all documents included in the files or whether the City can provide certain documents that allow CPC to fulfill their duties. This clarity will also help determine the timeframe for which the City will be able to produce all the necessary documents and what a production calendar will look like. Additionally, the City would like to discuss further what is expected in regards to the request for a production calendar.
3. What information will the City be redacting from materials produced to the CPC?
Per Charter §115-5, the Commission has the authority for "Accessing un-redacted complaints against officers and unreacted files of all closed investigations, except for information required to be withheld from persons who are not members of criminal-justice agencies under the Ohio Public Records Act or the Ohio Personal Information Systems Act, as they may be amended" (emphasis added). Additionally, the State LEADS Administrator has denied City requests to permit civilian employees "to review Criminal Justice Information (CJI) since they are not authorized recipients and the purpose does not qualify as the administration of criminal justice"

The City looks forward to discussing more tomorrow.

Thank you,



Hannah Macias, CIGA
Performance Auditor
Police Accountability Team
Phone 216-664-4049
Email: hmacias@clevelandohio.gov



From: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>
Sent: Monday, March 25, 2024 3:05 PM
To: Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Anderson, Leigh <LANDerson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>
Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>
Subject: RE: CPC Document Requests

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Thanks, Jason

From: Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>
Sent: Monday, March 25, 2024 3:04 PM
To: Heyer, Michelle L. (USAOHN) <MHeyer@usa.doj.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Anderson, Leigh <LANDerson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>
Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <SDeCaro@usa.doj.gov>; Evanovich, Michael (USAOHN) [Contractor] <MEvanovich@usa.doj.gov>; Fitzgerald, Patricia M. (USAOHN) <PFitzgerald@usa.doj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>
Subject: [EXTERNAL] Re: CPC Document Requests

I believe we are all set on the CPC side for a meeting tomorrow at 1 p.m.

From: Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>
Sent: Friday, March 22, 2024 9:33 AM
To: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Anderson, Leigh <LANDerson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>
Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com <karl.racine@hoganlovells.com>; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com <katie.obrien@hoganlovells.com>; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt,

Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: Re: CPC Document Requests

Ok. Thank you. I have reached out to the CoChairs to ask about Tuesday.

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From: Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Sent: Thursday, March 21, 2024 7:30:43 PM

To: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Anderson, Leigh <LAnderson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com <karl.racine@hoganlovells.com>; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com <katie.obrien@hoganlovells.com>; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: Re: CPC Document Requests

Is this in lieu of a meeting tomorrow or in addition to the meeting tomorrow?

From: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>

Sent: Thursday, March 21, 2024 5:54 PM

To: Macias, Hannah <HMacias@clevelandohio.gov>; Anderson, Leigh <LAnderson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com <karl.racine@hoganlovells.com>; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com <katie.obrien@hoganlovells.com>; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: RE: CPC Document Requests

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Let's make a tentative plan to meet during the second half of the biweekly meeting on Tuesday, if the CPC co-chairs are available. Martin and Jason – can you ask them if they join a virtual meeting at 1:00 Tuesday? If that isn't going to work, we'll try to schedule something for Wednesday or Thursday, so please get their availability for those days.

City – please submit written responses to the questions we've asked by COB Monday to ensure the Tuesday meeting will be productive in the limited time we will have.

From: Macias, Hannah <HMacias@clevelandohio.gov>

Sent: Thursday, March 21, 2024 4:47 PM

To: Heyer, Michelle L. (USAOHN) <MHeyer@usa.doj.gov>; Anderson, Leigh <LAAnderson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Thomas, Delante <dtthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <SDeCaro@usa.doj.gov>; Evanovich, Michael (USAOHN) [Contractor] <MEvanovich@usa.doj.gov>; Fitzgerald, Patricia M. (USAOHN) <PFitzgerald@usa.doj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: [EXTERNAL] RE: CPC Document Requests

Good afternoon Michelle,

Thank you for the update. As the City is working to determine the timeframes for each request, we will work to provide a production calendar as soon as we can. Unfortunately, multiple key members from the City will be unable to make tomorrow's call. The City will also be closed 3/29, so we would kindly ask if we can reschedule the CPC workgroup call sometime next week where the parties are available?

Thank you,



Hannah Macias, CIGA
Performance Auditor
Police Accountability Team
Phone 216-664-4049
Email: hmacias@clevelandohio.gov



From: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>

Sent: Thursday, March 21, 2024 9:16 AM

To: Anderson, Leigh <LAAnderson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Thomas, Delante <dtthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: RE: CPC Document Requests

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As a follow-up to my email below, during yesterday's telephonic status conference, the City said it has been working on responding to all of the CPC's outstanding information requests. In light of that, DOJ would like to expand request #2. At Friday's CPC workgroup meeting, please provide a rolling production calendar for all of the CPC's outstanding information requests.

Thank you.

Michelle L. Heyer

Assistant United States Attorney

United States Courthouse | 801 West Superior Ave. | Cleveland, Ohio 44113

T: 216.622.3686 | M: 216.338.4770 | michelle.heyer@usdoj.gov

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From: Anderson, Leigh <LAnderson2@clevelandohio.gov>

Sent: Thursday, March 14, 2024 10:48 AM

To: Heyer, Michelle L. (USAOHN) <MHeyer@usa.doj.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <SDeCaro@usa.doj.gov>; Evanovich, Michael (USAOHN) [Contractor] <MEvanovich@usa.doj.gov>; Fitzgerald, Patricia M. (USAOHN) <PFitzgerald@usa.doj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: [EXTERNAL] Re: CPC Document Requests

Greetings Michelle,

Many thanks for sending these questions a head of time; much appreciated.

In Truth and Service,



Leigh R. Anderson, PhD., MPA-IG, CIGA, CIGE

Executive Director

Police Accountability Team

City of Cleveland, Ohio

Desk Phone: 216-664-2951

Email: landerson2@clevelandohio.gov

"In any moment of decision, the best thing you can do is the right thing, the next best thing you can do is the wrong thing, and the worst thing you can do is nothing." -Theodore Roosevelt

From: Heyer, Michelle L. (USAOHN) <Michelle.Heyer@usdoj.gov>

Sent: Wednesday, March 13, 2024 5:03 PM

To: Anderson, Leigh <Landerson2@clevelandohio.gov>; Johnson, Carlos <CJohnson2@clevelandohio.gov>; Macias, Hannah <HMacias@clevelandohio.gov>; Thomas, Delante <dthomas3@clevelandohio.gov>; Bielat, Martin <MBielat@clevelandohio.gov>; Goodrick, Jason (CPC) <JGoodrick@clevelandohio.gov>

Cc: Yonekura, Stephanie <stephanie.yonekura@hoganlovells.com>; Charles See <charlessee907@gmail.com>; karl.racine@hoganlovells.com <karl.racine@hoganlovells.com>; Wilhelm, Abby Jae <abby.wilhelm@hoganlovells.com>; Giangrande Jacobs, Melissa <melissa.giangrande@hoganlovells.com>; katie.obrien@hoganlovells.com <katie.obrien@hoganlovells.com>; Coromelas, Acrivi (CRT) <Acrivi.Coromelas2@usdoj.gov>; DeCaro, Sara (USAOHN) <Sara.DeCaro@usdoj.gov>; Evanovich, Michael (USAOHN) [Contractor] <Michael.Evanovich@usdoj.gov>; Fitzgerald, Patricia M. (USAOHN) <Patricia.Fitzgerald2@usdoj.gov>; Geissler, Jonas (CRT) <Jonas.Geissler@usdoj.gov>; Mygatt, Timothy (CRT) <Timothy.Mygatt@usdoj.gov>

Subject: CPC Document Requests

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Hello, Dr. Anderson. To make the Friday, March 22 meeting on CPC document requests as productive as possible, we want to share with you a list of information DOJ will be asking for. We understand that you'll be meeting with various City parties between now and next Friday, so we wanted to get this to you in time to inform those discussions.

1. Going forward, how will the City handle production of requested materials to CPC that reside with OPS and the CPRB?
 2. When does the City expect to begin a rolling production to CPC of the materials that were the subject of the City's Motion for Relief (ECF #507), and when will the City have in place a schedule for completing production of those materials?
 3. What information will the City be redacting from materials produced to the CPC?
- Please let me know if you need clarification on any of these items. Thanks!

Michelle L. Heyer

Assistant United States Attorney

United States Courthouse | 801 West Superior Ave. | Cleveland, Ohio 44113

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